

CHARLES SHADID
EUO OF CHARLES SHADID

January 16, 2014

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EXAMINATION UNDER OATH

OF CHARLES SHADID

TAKEN ON BEHALF OF

ASPEN INSURANCE COMPANY

IN OKLAHOMA CITY, OKLAHOMA

ON JANUARY 16, 2014

BEGINNING AT 9:34 A.M.

APPEARANCES

FOR ASPEN INSURANCE COMPANY:

James P. Nader

LOBMAN, CARNAHAN, BATT, ANGELLE & NADER
400 Poydras Street, Suite 2300
New Orleans, Louisiana 70130
(504) 586-9292
jpn@lcba-law.com

FOR THE WITNESS:

Mark Engel
MANSELL & ENGEL
101 Park Avenue, Suite 665
Oklahoma City, Oklahoma 73102
(405) 232-4100
markengel@coxinet.net

Also Present: Jonna Holm
Wayne Marks

REPORTED BY: Jean Baysinger, CSR RPR RMR



EXHIBIT

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1 A L-a-m-o-t. Lamont, L-a-m-o -- Lamont,
2 L-a-m-o-n-t, I believe.

3 Q Okay. Just like it sounds. All right.
4 And are they located in Oklahoma City?

5 A No.

6 Q Where are they --

7 A Yeah, Harvey Lewis is.

8 Q Harvey's in Oklahoma City. Okay. And how
9 about --

10 A He's in Texas.

11 Q Beaumont, Houston, Dallas?

12 A I'd have to look it up. I don't remember.

13 Q What's the name of the PA firm for
14 Mr. Lamont? Do you know?

15 A That's the name of his firm.

16 Q All right. And Harvey Lewis goes by
17 Harvey Lewis?

18 A Same thing, Lewis -- Lewis & Associates.

19 Q All right. And in connection with that
20 2000 claim -- 2010 claim, you had public adjustors
21 look at the property, and insurance adjustors were
22 sent out by Covington.

23 A Yes.

24 Q Okay. Is it your understanding that
25 photographs were taken during either your PA's or

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1 the insurance company's inspections?

2 A Yes.

3 Q Do you have those?

4 A I think they have them.

5 Q All right. You weren't -- you don't have
6 a copy of that?

7 A Right offhand, I can't say yes or no.

8 Q You've never checked?

9 A I think I gave all my information to the
10 adjustor to adjust the claim, the photos I had and
11 everything.

12 Q The adjustor for the insurance company?

13 A My adjustors.

14 Q Your public adjustors.

15 A Right.

16 Q They took pictures and -- so you had
17 someone take separate pictures?

18 A No. They took pictures, Lamont and Harvey
19 Lewis.

20 Q Right.

21 A And what pictures I had, if I had any, I
22 gave to them.

23 Q You didn't keep anything?

24 A No.

25 Q Was a lawsuit filed?

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1 A Yes.

2 Q Where was it filed?

3 A Here.

4 Q Oklahoma City. And is that case over?

5 A No.

6 Q And what's the name of the lawsuit? Is it
7 Shadid Enterprises or Trust or --

8 A Charles A. Shadid, LLC.

9 Q All right. Versus Covington?

10 A Yes.

11 Q Who's representing you in that?

12 A Mr. Engel.

13 Q Oh, okay.

14 MR. NADER: Now I understand. What's your
15 first name?

16 MR. ENGEL: Mark.

17 MR. NADER: Mark. Thanks, Mark. With a C
18 or K?

19 MR. ENGEL: K.

20 MR. NADER: Thanks.

21 Q (By Mr. Nader) So have you given a
22 deposition in that case?

23 A No.

24 Q Have there been any depositions?

25 A No.



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1 Q No, but just filed claims.

2 A Oh, sure, I've had other claims.

3 Q All right. And they relate to these same
4 properties?

5 A Most of them, yes, unless I sold them,
6 because I sold properties, too.

7 MR. ENGEL: You've got ten years loss
8 reports, so --

9 MR. NADER: Yeah.

10 Q (By Mr. Nader) It appears that over a
11 several year period, you made about eleven million
12 dollars in insurance claims. Does that sound about
13 right?

14 A I don't know.

15 Q How long have you stopped -- has it been
16 since you practiced law?

17 A Around 15 or 20 years.

18 Q When you practiced law, did you represent
19 individuals in property claims?

20 A No.

21 Q What kind of --

22 A Bodily injury.

23 Q Just general bodily --

24 A Tort, yes.

25 Q Did you receive any money from the

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1 insurance carrier in connection with the 2010 claim?

2 A Yes.

3 Q Approximately how much?

4 A Right offhand, I can't tell you that. I'd
5 have to refer again --

6 Q Generally speaking, two, three million?

7 A I hate to say exactly because I don't
8 know.

9 Q Do you know approximately how much?

10 A Yes. Probably around two. I don't know.

11 Q All right.

12 MR. ENGEL: He's checking his notes to see
13 if he has any more questions.

14 MR. NADER: Sure.

15 MR. ENGEL: I was just going to tell y'all
16 that on these things, we didn't make a copy of
17 these, so if you want, y'all can take the originals,
18 but we'd like for you to copy them and then send the
19 originals back to us. Okay?

20 MS. HOLM: You know what? I can photocopy
21 them here if that's all right.

22 MR. NADER: Huh?

23 MS. HOLM: I can photocopy them here if
24 that's all right.

25 MR. NADER: I don't want to take the